

# FEDERAL PUBLIC DEFENDER

DISTRICT OF NEW JERSEY

K. ANTHONY THOMAS, INTERIM FEDERAL PUBLIC DEFENDER



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October 27, 2022

Hon. André M. Espinosa, U.S.M.J.  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, New Jersey 07101

**Re: Request for Bond Hearing  
United States v. Marc Lazarre  
Docket No.: 2:22-MJ-11280-AME**

Dear Judge Espinosa,

On October 20, 2022, Your Honor issued an order of detention for Mr. Marc Lazarre after hearing the parties' arguments regarding release. Since that hearing, Mr. Lazarre has provided an updated address, proposed third-party custodian, and proposed co-signer to Pretrial Services.

Given the updated information, we request a hearing to review Mr. Lazarre's release pending resolution of this matter. We will propose that he live with his mother, Marie Lazarre, who will act as third-party custodian. Moses Lazarre, Mr. Lazarre's brother, has been proposed as co-signer on any unsecured bonds. The names and contact information of both the proposed third-party custodian and co-signer have been submitted to Pretrial Services. At this time, Pretrial Services has not provided a position as to Mr. Lazarre's proposed bail package.

Therefore, we respectfully request that the Court schedule a hearing to review Mr. Lazarre's request for release. Thank you for your attention to this matter.

Respectfully submitted,

A handwritten signature in black ink.

Adalgiza A. Núñez  
Attorney for Defendant Marc Lazarre